

EXHIBIT K

From: Carlos Garcia Perez <cgarciaperez@smgqlaw.com>

Subject: Re: Bonnell / Doe

Date: October 7, 2025 at 4:43 AM

To: Andrew Brettler <abrettler@berkbrettler.com>, petersjoan <petersjoan@bellsouth.net>

Cc: Gustavo D. Lage <GLage@smgqlaw.com>, Andrea Garcia <agarcia2@gmail.com>, Angie Velando <angie@smgqlaw.com>, Robert "Bob" L. Raskopf <rraskopf@bilzin.com>, Patricia M. Patino <Ppatino@bilzin.com>, Jake Camara <jcamara@berkbrettler.com>, Joel Sichel <jsichel@berkbrettler.com>, Regina Peter <rpeter@berkbrettler.com>, Maria Favela <mfavela@berkbrettler.com>

Good morning I hope you are all doing well. The only issue on the deposition schedule is when and how you will take Plaintiff's deposition. Your client deposition date was agreed by the parties and properly noticed. Respectfully only a court order or an agreement by the parties may cancel or move the deposition date. We do not agree to change or cancel your client's deposition date. Thank you and we are looking forward to the conversation at 12. Carlos

Carlos A. Garcia Perez
Partner



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From: Andrew Brettler <abrettler@berkbrettler.com>

Date: Monday, October 6, 2025 at 6:50 PM

To: petersjoan <petersjoan@bellsouth.net>

Cc: Carlos Garcia Perez <cgarciaperez@smgqlaw.com>, Gustavo D. Lage <GLage@smgqlaw.com>, Andrea Garcia <agarcia2@gmail.com>, Angie Velando <angie@smgqlaw.com>, Robert "Bob" L. Raskopf <rraskopf@bilzin.com>, Patricia M. Patino <ppatino@bilzin.com>, Jake Camara <jcamara@berkbrettler.com>, Joel Sichel <jsichel@berkbrettler.com>, Regina Peter <rpeter@berkbrettler.com>, Maria Favela <mfavela@berkbrettler.com>

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SECURITY NOTE: *This email has originated from OUTSIDE of SMGQ Law. Please exercise caution with attachments and links *

Great. Happy to move the call to 9:00 a.m. PDT / 12:00 p.m. EDT tomorrow. In addition to discussing the deposition scheduling matter, we'll also use the call tomorrow as an opportunity to meet and confer with you regarding:

- 1) Plaintiff's incomplete document production;
- 2) Plaintiff's failure to provide amended responses to the requests for production;
- 3) Lauren Hayden's failure to respond to the subpoena or produce any documents responsive to the subpoena;
- 4) Plaintiff's failure to provide a current telephone number and/ email address for Abby Mc[REDACTED].

Sincerely,

Andrew R. Brettler | BERK BRETTLER LLP

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On Oct 6, 2025, at 3:42 PM, petersjoan <petersjoan@bellsouth.net> wrote:

Sorry, I meant to say that noon works for Carlos.

On Monday, October 6, 2025 at 05:38:36 PM EDT, Andrew Brettler <abrettler@berkbrettler.com> wrote:

I know 1pm works for him. That's the time he requested. You asked to move the call to 12pm. I'd like to make sure that Carlos is available to participate on the call if we reschedule it. Thanks.

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On Oct 6, 2025, at 2:36 PM, petersjoan <petersjoan@bellsouth.net> wrote:

yes, 1 pm does work for Carlos.

On Monday, October 6, 2025 at 05:15:32 PM EDT, Andrew Brettler <abrettler@berkbrettler.com> wrote:

Carlos requested a call at 1:00 p.m. EDT tomorrow. Does 12:00 p.m. also work for him?

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On Oct 6, 2025, at 1:29 PM, Joan Peters <petersjoan@bellsouth.net> wrote:

Can we speak at noon EDT tomorrow instead of one?

On Oct 6, 2025, at 3:09 PM, Andrew Brettler <abrettler@berkbrettler.com> wrote:

All:

Carlos suggested a call tomorrow at 10:00 a.m. PDT / 1:00 p.m. EDT. All those who are available to participate can use my dial-in: +1 (424) 208-2601 (no pin needed).

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On Oct 3, 2025, at 3:23 PM, Andrew Brettler <abrettler@berkbrettler.com> wrote:

Carlos:

Carlos.

We aren't confusing the issues. We're trying to schedule Mr. Bonnell's deposition and Plaintiff's deposition around the same time, in Miami, for practical reasons.

In that regard, Plaintiff can either appear for an in-person deposition during the week of Nov. 3, if Mr. Bonnell's deposition is going to take place on Nov. 6, or she can appear for deposition in Miami on Nov. 24, if Plaintiff wishes to take Mr. Bonnell's deposition there on Nov. 25. If your client is unwilling to sit for an in-person deposition in Miami—where she filed her lawsuit—anytime this month, we are not going to agree to produce Mr. Bonnell for an in-person deposition in Miami on Nov. 6 only to have to fly back there two weeks later to take Plaintiff's deposition. Plaintiff's position is simply unreasonable.

Happy to discuss by phone in advance of Mr. Bonnell seeking relief from the Court. Please advise of your availability for a meet and confer call on Monday. Thank you.

Sincerely,

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On Oct 3, 2025, at 1:46 AM, Carlos
Garcia Perez
<cgarciaperez@smgqlaw.com>
wrote:

Good morning I hope everyone is
doing well.

Let's please not confuse the issues
. Your client's deposition is set
for November 6 as agreed by the
parties. The issue is the method
and dates of our client's
deposition. You now have 5 dates
to pick when to depose our client.
Please let us know when you are
going to take her deposition.

As to the hardship , it's the negative
impact that it will cause on her
studies, among other issues. I hope
we can all appreciate and
understand that being the case .
Again your client's depo is set
for November 6, please let us